

**CB(1) 1292/01-02(04)**

Our Ref. : HKAPMC/ppc/2002/01

Your Ref. : CB1/PL/EA

Date : 18/02/2002

To : Clerk to the Environmental Affairs Panel  
by fax 2869 6794

Dear Sir,

LegCo Panel on Environmental Affairs

We refer to your letter ref. : CB1/PL/EA dated 31/01/2002.

We have no comment on the proposed amendments to the Technical Memorandum on Effluent Standards promulgated under Section 21 of the Water Pollution Control Ordinance Cap. 358 (WPCO).

However, we would like to attach our letter ref. : HKAPMC/ppc/2001/05 dated 04/05/2001 addressed to Waste Policy & Service Group for your consideration of necessary amendment to the WPCO. We have no intention to give oral presentation of the submission.

Yours faithfully,

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Simon Sham  
Professional Practice Committee

c.c. President

Our Ref. : HKAPMC/ppc/2001/05

Your Ref.: EP 170/3P/100

Date : 04/05/2001

Waste Policy & Services Group by fax 2318 1877  
E.P.D  
28/F, Southorn Centre,  
130 Hennessy Road,  
Wanchai, Hong Kong

Dear Sir,

Proposed Legislative Amendments to the Water Pollution Control Ordinance (WPCO)  
Cap. 358.

We refer to the captioned Amendment and consultative meeting held on 06/04/2001.

We wish to let you know one of our members' experience below:-

“ Company A manages several Properties with different ownership.

Property P1 was earlier found by EPD in offence of WPCO. Company A being the licence (Effluent Discharge) holder was fined for first offence.

Property P2 under different ownership from P1 was later found by EPD in offence of WPCO. Company A also being the licence holder was fined heavily for second/repeated offence.”

We consider that the WPCO is not fairly applied to the Building Owners of Property P2 to take a heavy fine (eventually) for the first offence. Therefore, we hope that you will consider necessary amendment to the WPCO so that it can be applied fairly to owners of different properties managed by the same management company.

Yours faithfully,

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Simon Sham  
Chairman  
Professional Practice Committee

c.c. President